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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda Du

ORDER ON

**PLAINTIFF SEC'S AGREED MOTION TO
EXTEND THE COURT'S TEMPORARY
RESTRAINING ORDER**

1 Plaintiff United States Securities and Exchange Commission ("SEC") respectfully requests
2 that – pursuant to Fed. R. Civ. P. 65(b)(2) – this Court extend the Temporary Restraining Order
3 ("TRO") in this matter until June 17, 2016. Defendant David B. Kaplan, Esq. consents to the
4 extension of the TRO for 14 days. Absent an extension, the TRO will lapse on June 3, 2016. In
5 support of its motion, the SEC states as follows:

6 1. On May 19, 2016, the SEC filed a complaint in this matter, and an emergency
7 motion seeking a temporary restraining order, asset freeze, and other emergency relief, along with a
8 supporting declaration and memorandum of law.

9 2. On May 20, 2016, the Court entered the TRO against all Defendants. (Dkt. No. 14.)
10 Among other relief, the TRO imposed an asset freeze on various accounts, which will expire on
11 June 3, 2016.

12 3. The SEC has good cause to request an extension of the TRO, asset freeze and other
13 relief entered on May 20. Counsel for Defendant Kaplan and the SEC are currently negotiating the
14 terms of an agreed preliminary injunction in this matter. While those negotiations take place,
15 Defendant Kaplan has agreed to extend the TRO, including the asset freeze, and other relief, for 14
16 days, until June 17, 2016.

17 4. Pursuant to Rule 65(b)(2), upon a showing of good cause, this Court has the
18 authority to extend the TRO for "a like period" – in this case 14 days.

19 WHEREFORE, to maintain the *status quo* pending entry of an agreed preliminary
20 injunction, the SEC respectfully requests that the Court extend the TRO, asset freeze, and other
21 relief for 14 days – until June 17, 2016.
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1 Respectfully submitted, this 26th day of May, 2016.

2 U.S. Securities and Exchange Commission

3 /s/ Alyssa A. Qualls

4 Alyssa A. Qualls

5 Senior Trial Counsel

6 IT IS SO ORDERED:

7 

8 Honorable Miranda Du

9 United States District Court Judge

10 DATED: May 27, 2016